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State of Nevada ex rel. Nevada
Department of Corrections ("NDOC"),
Betty T. Omandac, Monique K. Liefert,
Amanda J. Hopkins, Christopher W. Nehls,
and Shellyann Weigert*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LUCIA RAMOS-QUIRARTE,

Plaintiff,

v.

STATE OF NEVADA *ex rel.* NEVADA
DEPARTMENT OF CORRECTIONS;
STATE OF NEVADA *ex rel.* NEVADA
DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
FORESTRY; BETTY T. OMANDAC, an
individual; MONIQUE K. LIEFERT, an
individual; AMANDA J. HOPKINS, an
individual; CHRISTOPHER W NEHLS, an
individual; SHELLLYANN WEIGERT, an
individual; DOES I to X, inclusive; and
DOES XI to XX, inclusive; collectively,

Defendants.

Case No. 2:23-cv-01778-RFB-NJK

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS TO
FILE A REPLY IN SUPPORT OF
MOTION FOR RECONSIDERATION
OF THE COURT'S MARCH 31, 2025
ORDER**

[FIRST REQUEST]

Parties, by and through counsel, hereby respectfully submit this Stipulation and
Order Extending Time for Defendant to file a Reply in Support of Motion for
Reconsideration of this Court's Order dated March 31, 2025, ECF No. 55. The underlying
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1 motion was filed on April 28, 2025, the response was filed on May 12, 2025, and the reply
2 is currently due on May 19, 2025, to be extended to May 26, 2025.

3 Defendant's counsel has been actively working on their reply in support of their
4 motion; however, counsel requires a brief extension to complete the reply. Counsel for
5 Defendants is working on providing discovery responses for three cases that are quite
6 extensive and have taken more time than was expected.¹ Two of those cases' discovery is
7 expected to be completed and sent out by May 17, 2025, and the third should be May 23,
8 2025. This request for extension is made in good faith and not for the purposes of delay.

9 WHEREFORE, the parties stipulate that the time for Defendants to file their reply
10 in support of their Motion for Reconsideration should be extended to May 26, 2025.

11
12 DATED this 16th day of May 2025.

DATED this 16th day of May 2025.

13 LAWRENCE & LAWRENCE LAW, PLLC

AARON D. FORD

Attorney General

14
15 /s/ Nathan E. Lawrence

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Office of the Attorney General

Attorneys for Defendant

21 **ORDER**

22 **IT IS SO ORDERED.**

23 

24 **RICHARD F. BOULWARE, II**

UNITED STATES DISTRICT JUDGE

26
27 ¹ Those cases are *Wolf v. State of Nevada, ex. rel. Nevada Department Of Corrections,*
28 *et al.*: USDC 3:22-cv-00308-MMD-CSD (consolidated with *Santana v. v. State of Nevada, ex. rel. Nevada Department Of Corrections, et al.* - USDC 3:23-cv-00395-ART-CSD); *McCallister v. Dzurenda* - 2:24-cv-01440-GMN-BNW; and *Galbraith v. Minev* - USDC 2:21-cv-00932-RFB-DJA. All four offenders are represented by counsel in these cases.